

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
LARONDA R. MARTIN
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
LaRonda_Martin@fd.org

6 Attorney for John Burnett
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 JOHN BURNETT,

15 Defendant.
16

Case No. 2:21-mj-00777-VCF

**STIPULATION TO CONTINUE
PRELIMINARY HEARING
(First Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 LaRonda R. Martin, Assistant Federal Public Defender, counsel for John Burnett, that the
21 Preliminary Hearing currently scheduled on October 18, 2021, be vacated and continued to a
22 date and time convenient to the Court, but no sooner than forty-five (45) days.

23 The Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant needs additional time to review the preliminary
25 discovery, forthcoming from the government, with Mr. Burnett. The parties are attempting to
26 negotiate the matter pre-indictment. Counsel for the defendant also needs additional time to
determine whether there are any pretrial issues that must be litigated, determine whether the

1 case will ultimately go to trial and/or determine whether the matter can be resolved through
2 negotiations pre-indictment.

3 2. The defendant is not incarcerated and does not object to the continuance.

4 3. The parties agree to the continuance.

5 4. The additional time requested by this stipulation is excludable in computing the
6 time within which the defendant must be indicted and the trial herein must commence pursuant
7 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
8 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

9 This is the first stipulation to continue filed herein.

10 DATED this 8th day of October, 2021.

11 RENE L. VALLADARES
12 Federal Public Defender

13 */s/ LaRonda R. Martin*
14 By _____

15 LARONDA R. MARTIN
16 Assistant Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

13 */s/ Bianca R. Pucci*
14 By _____

15 BIANCA R. PUCCI
16 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JOHN BURNETT,
8


9 Defendant.

Case No. 2:21-mj-00777-VCF

ORDER

10 IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for
11 Monday, October 18, 2021 at 4:00 pm, be vacated and continued to November 29, 2021 at the
12 hour of 4:00 p.m.; or to a time and date convenient to the court.
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14 DATED this 8th day of October, 2021.

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16 UNITED STATES MAGISTRATE JUDGE
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